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Attorneys for Defendant,
FAMILY DOLLAR, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DAVID SMITH,
Plaintiff.

vs.
FAMILY DOLLAR, INC., a North
Carolina Corporation; DOES I through X;
and ROE BUSINESS ENTITIES I through
X, inclusive.

Defendant.

Case No.: 2:15-cv-00945-JCM-PAL

**[PROPOSED] STIPULATION AND
ORDER TO EXTEND TIME FOR
DEFENDANT FAMILY DOLLAR, INC. TO
ANSWER OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

Plaintiff DAVID SMITH (hereinafter “Plaintiff”) and Defendant FAMILY DOLLAR, INC. (hereinafter “Defendant”), by and through their respective counsel of record, hereby stipulate and agree to extend the time for Defendant to answer or otherwise respond to Plaintiff’s Complaint, up to and including June 17, 2015.

This extension is necessary to provide adequate time for recently retained counsel for Defendant to receive and review necessary information in order to prepare an answer or to otherwise respond to the Complaint. This is the first request for an extension of time to answer or otherwise respond to the Complaint.

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1 The parties agree and represent to the Court that this request is made in good faith and not for
2 the purpose of delay.

3 Dated: May 22, 2015.

4 Respectfully submitted,

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7 /s/ James P. Kemp
JAMES P. KEMP, ESQ.
KEMP & KEMP

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9 Attorney for Plaintiff,
DAVID SMITH

Dated: May 22, 2015.

Respectfully submitted,

/s/ Crystal J. Herrera
WENDY MEDURA KRINCEK, ESQ.
CRYSTAL J. HERRERA, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant,
FAMILY DOLLAR, INC.

10
11 **ORDER**

12 **IT IS SO ORDERED.**

13 Dated: May 26, 2015.

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UNITED STATES MAGISTRATE JUDGE